

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HARRIS CORPORATION,

Plaintiff,

v.

HUAWEI DEVICE USA, INC.,
HUAWEI DEVICE CO., LTD.,
HUAWEI TECHNOLOGIES USA INC.,
HUAWEI TECHNOLOGIES CO. LTD., AND
HUAWEI DEVICE (SHENZHEN) CO., LTD.

Defendants.

No. 2:18-cv-439-JRG (LEAD CASE)

Jury Trial Demanded

**DECLARATION OF MADHAV BHATTA IN SUPPORT OF HUAWEI'S
RESPONSE IN OPPOSITION TO HARRIS'S MOTION TO COMPEL**

I, Madhav Bhatta, declare:

1. I am over the age of 21, competent to make this declaration, and have personal knowledge of the matters stated herein.
2. I am currently employed as Vice President of Solution Sales and Marketing by Defendant Huawei Technologies USA, Inc. I have been employed by Huawei Technologies USA, Inc. since August 2010.
3. I have reviewed the list of accused products contained in Harris Corporation's infringement contentions, dated April 3, 2019.
4. Huawei Technologies USA, Inc. is focused on the enterprise and carrier-network markets, providing products, solutions, and services for those markets, including, for example WLAN products. Huawei Technologies USA, Inc. does not make, use, sell, offer for sale, or

import into the United States the accused phones, tablets, and laptops (“consumer devices”) identified on pages 7-8 and 10-11 in Harris Corporation’s infringement contentions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 8/12/2019


Madhav Bhatta